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11 Attorneys for Defendants Daniel Helmhold,
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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

NATHAN CAMPOS,

Plaintiff,

v.

DANIEL HELMHOLD, *et al.*,

Defendants.

Civil Case No. 2:22-cv-3959-GHW-AS

**JOINT STIPULATION TO
CONTINUE SCHEDULING
CONFERENCE AND MODIFY
MOTIONS BRIEFING SCHEDULE**

Complaint Served: May 10, 2022

1 **WHEREAS**, Defendants Daniel Helmhold, Big Fish Games, Inc., and Aristocrat
2 Leisure Ltd. (“Defendants”) removed this action to federal court from the Superior Court
3 of the State of California for the County of Los Angeles on June 9, 2022;

4 **WHEREAS**, Plaintiff Nathan Campos filed a motion to remand the case to
5 Superior Court on June 27, 2022;

6 **WHEREAS**, Defendants have informed Plaintiff that Defendants intend to file a
7 motion to dismiss and/or transfer the case;

8 **WHEREAS**, there is currently a Scheduling Conference in this case set for July
9 14, 2022 at 8:30 a.m.;

10 **WHEREAS**, the parties agree that continuing the Scheduling Conference until
11 after the resolution of at least Plaintiff’s motion to remand would promote efficiency and
12 conservation of judicial resources;

13 **WHEREAS**, the parties have agreed and stipulated to continue the Scheduling
14 Conference and a modified briefing schedule for Plaintiff’s motion to remand and
15 Defendants’ expected motion to dismiss and/or transfer the case as set forth below;

16 **WHEREAS**, the Court previously granted the parties’ joint stipulation to extend
17 time for Defendants to respond to Plaintiff’s Complaint, *see* Dkt. No. 10;

18 **WHEREAS**, the continuance of the Scheduling Conference and the modification
19 of the motions briefing schedule will not alter the date of any other event or any deadline
20 already fixed by court order, with the exception of the July 7, 2022 deadline for the
21 parties to submit a Joint Rule 26(f) Report;

22 **WHEREAS**, by entering into this stipulation, the parties do not waive any rights,
23 defenses, or arguments, including any jurisdictional challenges;

24 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, by and
25 between Plaintiff and Defendants, through their undersigned counsel, that:

26 1. The Scheduling Conference currently set for July 14, 2022 and joint Rule 26(f)
27 report shall be continued to a date to be determined by the Court after the
28 resolution of Plaintiff’s motion to remand.

- 1 2. Defendants' deadline to respond to the First Amended Complaint shall be extended
2 to September 6, 2022.
- 3 3. The briefing schedule for Plaintiff's motion to remand shall be modified as
4 follows:
 - 5 • August 1, 2022: Deadline for Defendants to file opposition.
 - 6 • August 15, 2022: Deadline for Plaintiff to file reply.
 - 7 • Plaintiff's motion shall be re-designated for hearing on August 29, 2022 at
8 8:30 a.m. or as soon thereafter as the Court may hear the parties.
- 9 4. The briefing schedule for any motion filed by a Defendant under Rule 12 of the
10 Federal Rules of Civil Procedure shall be as follows:
 - 11 • September 6, 2022: Deadline for Defendants to file any motion under Rule
12 12 of the Federal Rules of Civil Procedure.
 - 13 • September 23, 2022: Deadline for Plaintiff to file opposition.
 - 14 • October 7, 2022: Deadline to for Defendants to file reply, if any.
 - 15 • Defendants shall designate a Motion Day of no earlier than October 21,
16 2022.

1 Dated: June 27, 2022

COVINGTON & BURLING LLP

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3 By: /s/ Emily Johnson Henn
4 Emily Johnson Henn

5 Attorneys for Defendants Daniel
6 Helmhold, Big Fish Games, Inc.,
7 and Aristocrat Leisure Limited

8 Dated: June 27, 2022

THE RYAN LAW GROUP

9 By: /s/ Andrew T. Ryan
10 Andrew T. Ryan

11 Attorney for Plaintiff

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14 Local Rule 5-4.3.4 Certification: I hereby attest that all other signatories listed, on
15 whose behalf this filing is submitted, concur in the filing's content and have authorized
16 this filing.

17
18 /s/ Emily Johnson Henn
19 Emily Johnson Henn